privIQ

GDPR

Onboarding Guide

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Implementation Guide

This guide may be used where your country's regulation and terminology are like that of the GDPR. Sections like the DPO are specific to the GDPR and may not apply to your regulation.

Your organisation is the Controller. We suggest you adopt the following approach to rolling out your privacy compliance program.

1. Understand the organisation's activity by asking:
    - what are the core activities?
    - how many employees?
    - do you outsource the processing of personal data?
    - do you disclose personal data to other organisations?
    - do you transfer personal data outside your country or region?
    - who heads up departments, e.g., HR, Sales and others that deal with personal data?
    - who is leading the privacy program?

2. Heads of departments (**Information Owners**) to formulate a list of ALL processing activities that involve personal data; including any informal activities. If possible, record the sources of the personal data, in which applications do they process personal data, where the information is stored in their departments, and to whom the information is disclosed. Include physical media as well.

3. Heads of IT / Procurement to compile a list of all Vendors involved with processing of personal data, the country in which they are located, the expiry date of those contracts.

4. Inform the CEO / MD / head of organisation of the data protection program.

5. Appoint the Data Protection Officer, where appropriate.

6. Register with the Relevant Authority, where required.

7. Ensure your Organisation Settings are complete. (See next section).

8. Add the relevant heads of departments and the program lead as users with the system role of Administrator. (Compliance User and Task Owner must be added via the Compliance sections).

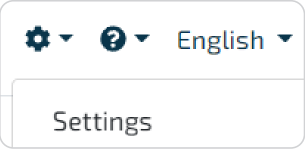
9. Following point 2. above, Information Owners to review and understand ALL processing of personal data in their respective departments. Be aware of and record all *informal* processing too. For example, populating spreadsheets to manage processes outside of the formal, networked and security protected systems and apps.

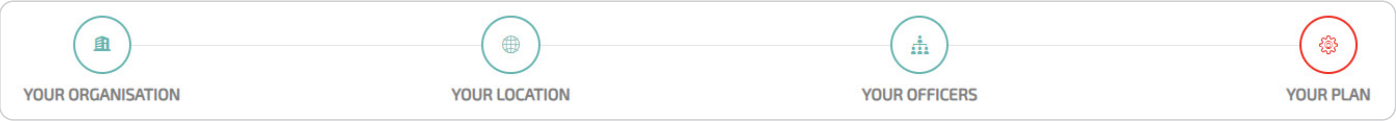
10. Begin the data mapping exercise, using the prep work done by the Information Owners and record any work to be done beyond this session. The head of IT could provide valuable insight or guidance especially around any processing of personal data that may be outsourced to **Processors** as well as the processing done by IT. Set a date for a follow-up data mapping session. Use the follow-up session to complete the data mapping exercise.

Follow the steps as indicated by the various sections below – remember, **compliance is on-going.**

Organisation Setup

To get to Settings, click the wheel in the upper navigation bar.





Under **'Your Organisation'** enter your contact details and upload your logo.

Under **'Your Location'** enter your physical and postal addresses. Ensure that you select the relevant supervisory authority. Ensure that a time zone is selected. (Only in GDPR).

Under **'Your Officers'** enter the organisation lead's (e.g., the CEO) name and email address as well as the DPO's details, where available.

Under **'Your Plan'** you will find the settings and features that determine your package size. Be aware of switching between data mapping by department. **Any data mapping done prior to your switching will be lost.**

Key Terms

These key terms are essential to the proper interpretation of GDPR and to maintain the app.

Controller – means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data e.g., your organisation.

Processor – means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller e.g., the external payroll company that does your monthly payroll run.

Personal Data – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data Subject – means the person to whom personal data relates.

Information Owner – an individual that has approved management responsibility for controlling the maintenance, use and security of the personal data.

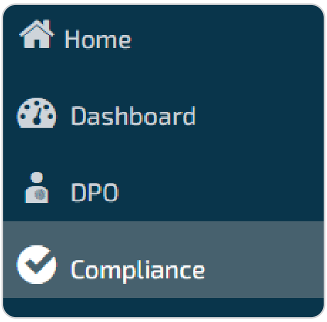
Data Protection Officer (DPO)

Each organisation is required to do an internal analysis to determine whether it needs to appoint a DPO. The GDPR requires the appointment of a DPO for any public authority or any organisation carrying out intrusive processing. Regular and systematic monitoring of data subjects on a large-scale or the processing of special category personal data on a large-scale is considered intrusive processing. If you're uncertain as to whether your activities constitute intrusive processing, you should consult with your Supervisory Authority.

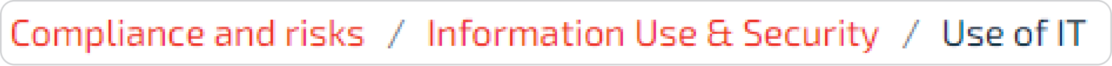
Complete the questionnaire, then the checklists, and if not already done under Settings, enter the DPO's details. Even you don't appoint a DPO, there are 2 checklist items you must complete.

Home Page

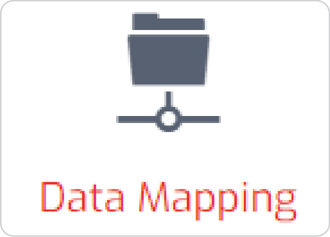
The features you see on the home page will be those that were selected under Your Plan in the Organisation Settings. When switching between different sections you are encouraged to use the sidebar.



At other times it might be convenient to click on the breadcrumb, as in the below picture where you're simply moving 1 level back to 'Information Use & Security'.


Compliance and risks / Information Use & Security / Use of IT

Data Mapping



Remember that saying regarding risk – “you can’t manage it if you can’t see it”? If people make enquiries about their personal data, or there’s an incident, you need a detailed map to help you respond. But data mapping is much more than producing an inventory.

This represents the first step towards building a proper foundation upon which to manage your compliance program. The who, why, when, where and what of processing. Throughout the process you may add your own data items, should the default items not be sufficient.

Information owners must direct the data mapping and be involved throughout the process. Identify any informal processing and record it in the data mapping. These are typically the areas of vulnerability, and any risks or issues should be documented and managed in the relevant compliance section.

Before you begin, a word on granularity

Granularity is important when describing your processing purposes. Don’t crowd many types of processing into a singular description, especially where there are different types of personal data, and different **Processors**. At the same time, you don’t want to be overly granular when entering personal data types. Rather than recording every data element in a passport, would it not be better to say, “Passport details”?

Granularity is also important when it comes to Information Assets (in-house processing locations). You don’t want to use ‘Application Server’ when that could be meaningless to someone who manages subject access requests. Add a location that is more descriptive, that enables the person to search the relevant systems or apps when searching for personal data to be used in response to a subject access request.

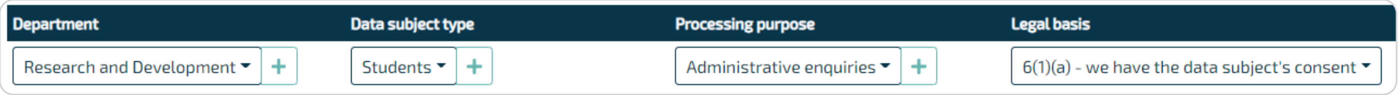
If there are commercial sensitivities around having the names of **Processors or Controllers** on your privacy notices then, add them as category names here and then add them individually in the Processors or Data Sharing sections, respectively. For example, you might not want to use ‘Paula’s Payroll Services’, but rather use ‘Payroll Processing Company’ instead.

Data mapping is done in phases:

In our example, we're doing **data mapping by department.**

Record the 'who' and 'why'

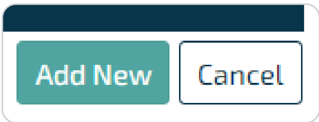
To begin, select the relevant data elements from the drop-down lists (or add new elements by clicking the green cross).



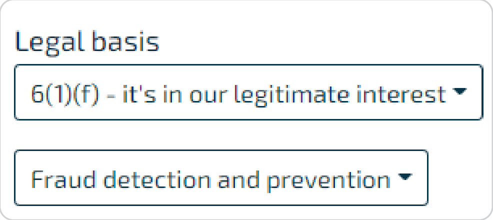
Department	Data subject type	Processing purpose	Legal basis
Research and Development	Students	Administrative enquiries	6(1)(a) - we have the data subject's consent

Select the department, data subject type (WHO), processing purpose (WHY) and lawful basis.

Then, clicking 'Add New' will take you to the next step where you describe the 'what' and 'where'.



NOTE: If you select the lawful basis – ***'it's in our organisation's legitimate interest',*** in the next section you must indicate the type of legitimate interest and, you should use the template to complete a legitimate interest impact assessment. This is done to ensure that your organisation's interests don't outweigh those of the data subject.

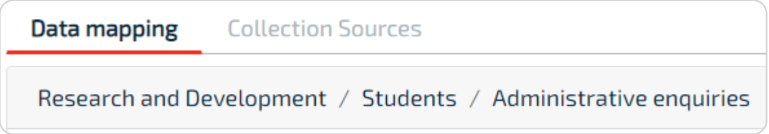


Legal basis

6(1)(f) - it's in our legitimate interest

Fraud detection and prevention

Describe the 'what' and 'where'

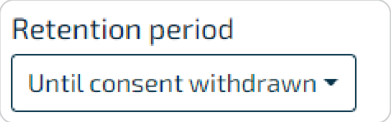


Research and Development / Students / Administrative enquiries

Clicking 'Add New' earlier will open the above box where you will need to:

For this example 'purpose', …Administrative enquiries…

Enter the Retention Period (you may add your own by selecting 'Other')

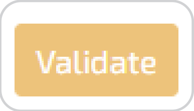


Retention period

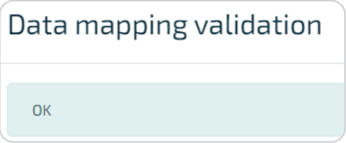
Until consent withdrawn

Enter the **Personal Data** types
Enter the **Special Category Personal Data** types, including that **second lawful basis**
Enter the **Processing locations**, In-house (within the organisation) and, externally by any **Processors** (See the earlier note on granularity)
Under **Data Sharing**, add any **Controllers** to whom you disclose personal data
Add relevant **Notes and Files**.

Once you're happy with your input, click 'Validate'



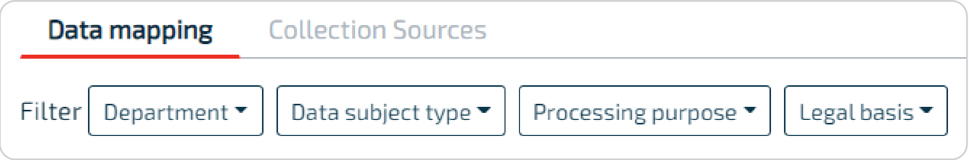
If you see 'OK', then you're done with this piece of data mapping. If not, you will be informed as to where to complete your data mapping.



Data mapping validation

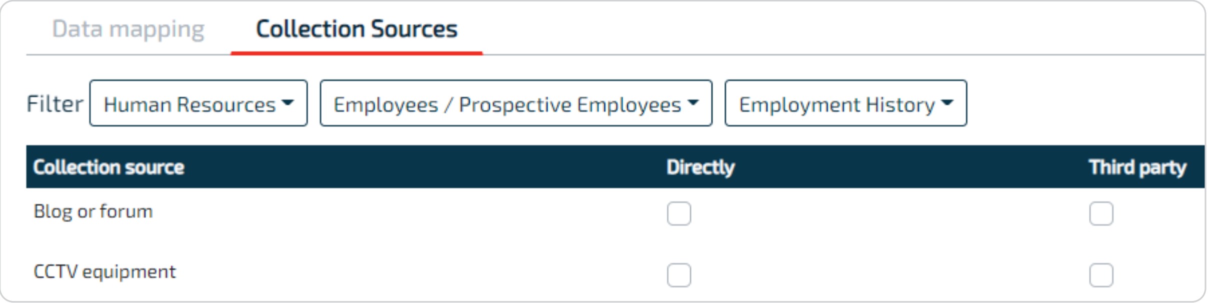
OK

Continue data mapping for the next new set of data subject types, purposes. Use the Filter if you are editing existing entries.



OR, go to Collection Sources.

Identify the collection source



Collection source	Directly	Third party
Blog or forum	☐	☐
CCTV equipment	☐	☐

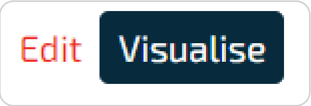
After successfully validating each section under Data Mapping, indicate the Collection Source/s for each of the personal data or special category types you selected in the data mapping.

Use the Filter to select the department, data subject type and personal data type. Select the collection source/s and if it's from a Third Party, enter the category of the third party e.g., Credit Bureau.

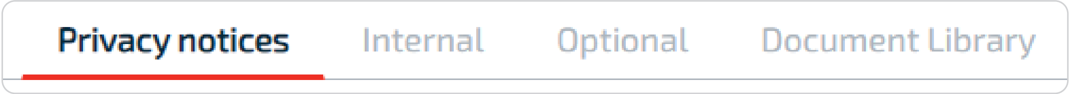
Click Validate. If there are issues, the validation will inform you as to where the issues are. If you see 'OK', move on to the next set of collection sources.

Data mapping will integrate with the **Records of Processing Report** which you will find under Governance.

HINT: In Data Mapping and Collection Sources, click 'Visualise' to get an overview of your progress.

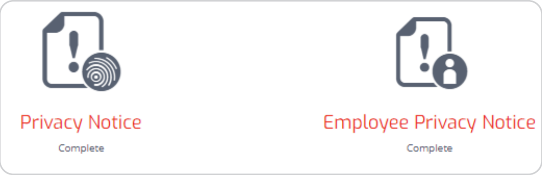


Governance

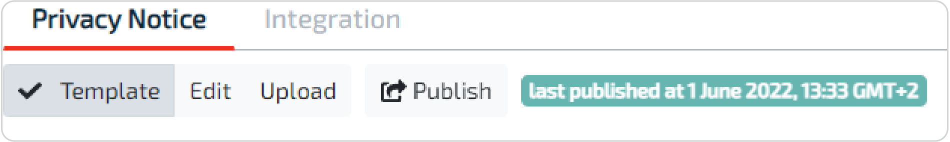


Maintenance of your organisation settings and your data mapping provides essential information to your privacy notices templates. In Governance, the Record of Processing must be maintained and there are documents that you need to share with employees.

Privacy Notices

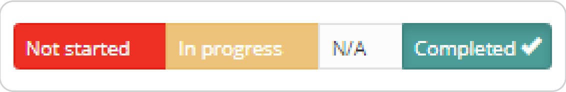


The GDPR has specific requirements for notifying individuals when collecting their personal data. The keyword being – *collecting*. Your notice must be displayed at or near the point of collection. Notice the external Privacy Notice as well as one for Employees. Click 'Privacy Notice'.



There are 3 options. The template which is updated from organisation settings and data mapping; the editable version where you create your own content; or the option to upload your own PDF. Regardless of the option, you must remember to regularly **Publish** the privacy notice.

Once published, set the status to Completed – this will update your dashboard.

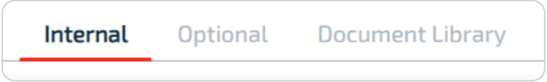


Remember to publish the employee privacy notice too.

Integration

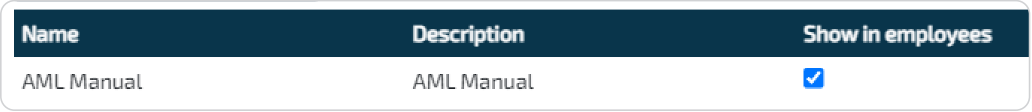
The integration tab is next to the privacy notice tab. Here you will find the **code that you can embed in your websites** so that when people click on your privacy notice link, they will see whatever you have published here. There is also the option to download your published version in case you share the privacy notice other than via your websites. It is unlikely that you will present your employee privacy notice on your websites, but you must publish it before you share with your employees.

Training & Awareness



One of the ways to demonstrate compliance is to show how you have promoted the relevant training & awareness within your organisation. In these tabs you can find documents to share with various employees. Some of them have the ‘template’, ‘own version’, ‘upload’ options. If you are going to share a document with employees and other stakeholders, **you MUST set the document status to ‘Complete’.** If you don’t want to share them, mark them as N/A.

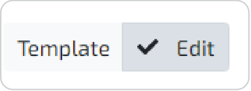
In the Document Library you can edit or upload your own documents. If you want to share them, you must tick ‘Share with Employees?’



Name	Description	Show in employees
AML Manual	AML Manual	☑

Security Measures

To maintain your Records of Processing Activities report, provide a general description of the measures adopted by your organisation which ensure a level of security that is appropriate to the risks of the processing of personal data. Where your organisation processes personal data on behalf of other organisations (and makes you a processor), provide a general description of the organisational security measures that might relate specifically to those categories of processing activities.



Records of Processing Activities

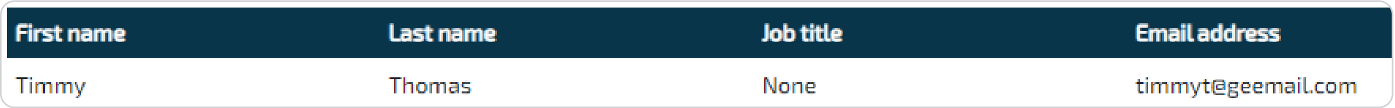
To demonstrate compliance with the GDPR, the controller or processor should maintain records of processing activities under its responsibility. Each controller and processor should be obliged to cooperate with the Authority / Regulator and make those records, on request, available to it, so that it might serve for monitoring those processing operations. This report is automatically updated from having completed your data mapping and the security measures outlined above.

Automated Decision Making

Profiling’ involves (a) automated processing of personal data; and (b) using that personal data to evaluate certain personal aspects relating to a natural person. Automated processing implies the exclusion of any human intervention in any decisions which may be taken about such profiling. This is where you inform data subjects of their associated rights as well as the suitable safeguards. Content captured here will update the Template Privacy Notice.

Employee Communications

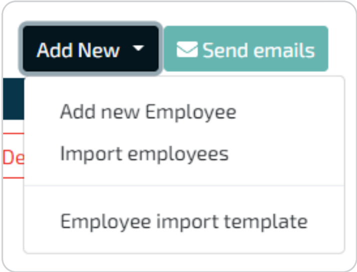
Employees are directly involved in the organisation – managers, employees, directors, trustees etc. One of the ways in which to demonstrate compliance with GDPR is by keeping all employees informed of their roles and responsibilities towards privacy protection. In the Governance section you would have selected the relevant documents that you would need to share with your employees, contractor workers, and the like. Go to the Compliance section.



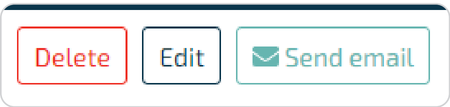
First name	Last name	Job title	Email address
Timmy	Thomas	None	timmyt@geemail.com

NOTE: You will only be able to select documents that have been set as 'Complete' in the Governance section.

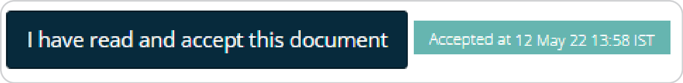
You may add an employee individually or use the template to upload. You may send emails globally, i.e., to everyone, by clicking 'Send emails'...



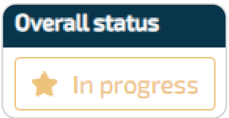
Or you can email individually by clicking 'Send email' next to the employee's name. You can also customise your message to the individuals.



They will need to open that document by clicking the link in the email, reading the document, and then clicking 'I have read and accept this document'.

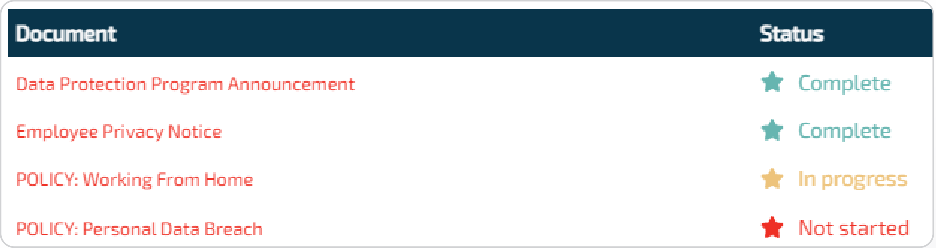

I have read and accept this document
Accepted at 12 May 22 13:58 IST

The overall status appears next to each employee name.



Overall status
★ In progress

If you click on an employee, you will see the status of each document. A red star means the document has not been sent. An orange star means it has been sent but there is no response. A green star means the employee has accepted the document. Hover over the stars to see the meta-data.

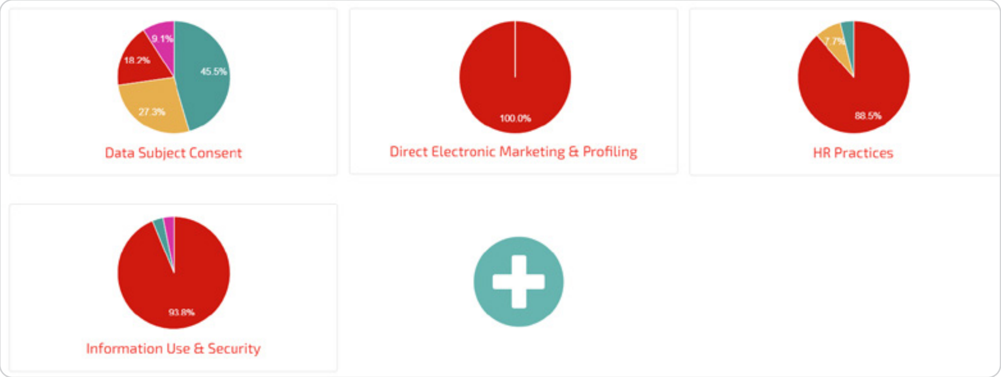


Document	Status
Data Protection Program Announcement	★ Complete
Employee Privacy Notice	★ Complete
POLICY: Working From Home	★ In progress
POLICY: Personal Data Breach	★ Not started

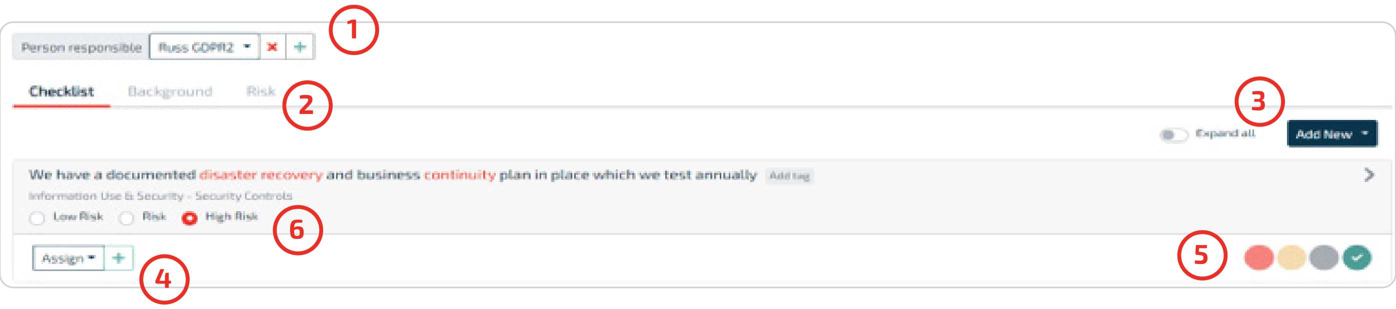
Compliance

Compliance

Operations involving the processing of personal data require regular review, assessment, and maintenance. Depending on your organisation's structure, you may need to get others involved – the Information Owners, e.g., your HR Manager, IT Manager, Sales Manager etc. When you do your data mapping you will almost certainly uncover operational risks and issues that need to be managed. If these are not covered by the default sections and tasks, you may add your own sections and tasks.



By way of example, let's look at 'Security Controls' which you will find under 'Information Use & Security'.

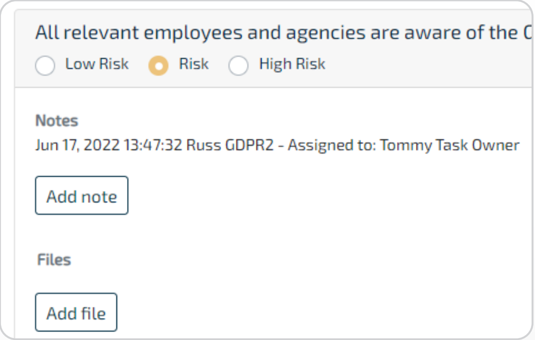


We have a documented disaster recovery and business continuity plan in place which we test annually

Information Use & Security - Security Controls

○ Low Risk ○ Risk ● High Risk

1. You MUST assign all compliance sections to Compliance Users. If not in the drop-down list, add users by clicking the green cross. A compliance user only sees sections assigned.
2. Find useful information in the Background and Risk Rankings tabs.
3. Add your own relevant checklist items individually, or upload using the csv template.
4. Assign checklist items to Task Owners and, **most importantly, set a review cycle** which triggers notifications to the task owners.
5. Assess your organisation's progress against each checklist item. (Not started; In progress; N/A; Complete)
6. Reset the residual risk level after you set your Status (in **5.**).



All relevant employees and agencies are aware of the C

○ Low Risk ● Risk ○ High Risk

Notes

Jun 17, 2022 13:47:32 Russ GDPR2 - Assigned to: Tommy Task Owner

Files

NOTE: By clicking the drop-down arrow on the right, the task owner can add audit notes and upload documents in support of the review.

Setting items to Complete in the Information Use & Security will also update the Records of Processing Activities Report which you will find under Governance.

> **BIG TIP:** By clicking the white cross in the green circle, you may add your own sections and checklist items in each section. This feature is especially useful where you need to manage risks and issues you identify during the onboarding procedure or during normal operations.

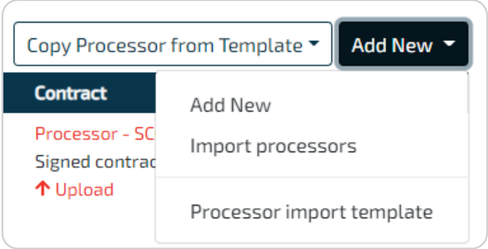
Monitoring Compliance

Run this report to keep track of and report on your compliance journey. Use the filter to target specific sections. Download the report in PDF or Excel format. It's good practice to regularly run and print the full report.

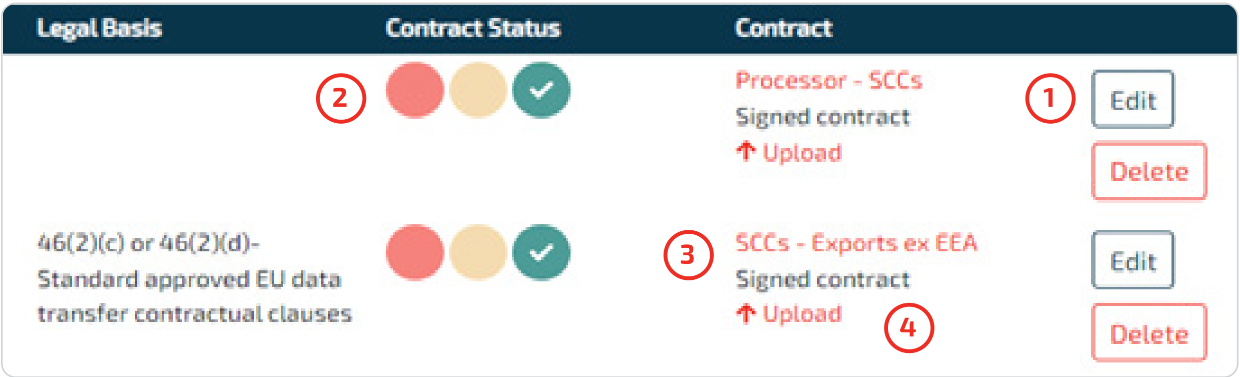
Processors

A Processor is a person/organisation that processes personal data on your behalf, under contract. They cannot use the personal data for their own purposes. An example would be a company that does payroll processing on behalf of your company.

Note that there is a Checklist. Go to Processor register. If you added any Processors in data mapping, they would appear here. This is where you maintain the Processor contracts. You could have uploaded your Processors here and they would have been available when you did your data mapping. You can add individually or by using the import template.



GDPR doesn't say *who* must draw up the contract, only that the Controller (your organisation) must ensure that the written contract stipulates the appropriate security measures that the Processor must establish and maintain. You might well find that some Processors already have the relevant contract *template*.

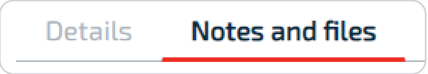


Legal Basis	Contract Status	Contract	
	● ● ✓	Processor - SCCs Signed contract ↑ Upload	Edit Delete
46(2)(c) or 46(2)(d)- Standard approved EU data transfer contractual clauses	● ● ✓	SCCs - Exports ex EEA Signed contract ↑ Upload	Edit Delete

Edit the form **(1)** by completing the contact details, the contract start and end date. Set the status and Save the form. The status will display here **(2)**, Once you have the signed contract, upload it here **(4)**

You would have noticed that there is nothing under Lawful basis for our first Processor. That's because, in this example, they are based within the EU. However, the lawful basis in the second example **(3)** is 'SCCs – Exports ex EEA'. The link **(3)** takes you to the EDPB site that has the standard contractual clauses. will display a suggested template for BCRs. What is this about? – **it's important for you to understand Chapter V of GDPR** (or the relevant section in your Data Protection Act dealing with international transfers)

New feature – when you Edit a Processor you may now add Notes and Files to every Processor.



Data Sharing

Unlike the ‘sharing’ of personal data between Controller and Processor (which is under written contract), here we speak of the sharing (or, disclosure) of personal data ***between Controllers.*** An example might be the organisation providing medical insurance to your employees. In most cases there should already be some sort of agreement acknowledged between the two organisations. Simply upload a copy and set the status to Signed.

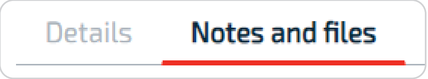
The functionality within the app is identical to the Processors section, except that the external links are relevant to controller-to-controller relationships.

It might help to look at a simple example.

Let’s say that a travel agent makes bookings on behalf of its clients with an airline and hotel chain. It’s unlikely that the hotel chain and airline would be considered Processors. They are Controllers in their own right. But what if the three companies got together to develop a system or app that would be of value to ALL their clients? Now we’re talking of *further* processing that brings about a **JOINT** sharing relationship – and will almost definitely require data subjects’ consent. In fact, all the other Conditions (principles) come into play. It’s important the data subject knows who to approach.

A more sophisticated and potentially, more-risky scenario of personal data sharing will be that of the world of data brokers.

New feature – when you Edit a Controller you may now add Notes and Files to every Controller.



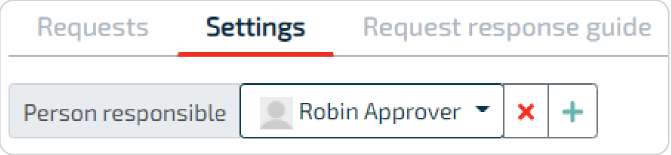
Data Subject Access Requests

DSAR

There are several reasons why individuals might want to gain access to their personal data and several ways in which they can make these requests for access. Equally, there are several different responses that could come from your organisation.

PrivIQ provides requesters with an online link and allows you to receive or capture the requests, delegate them as appropriate, navigate and understand the rules and gain oversight of progress via a dashboard.

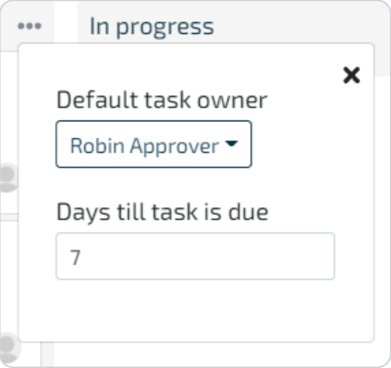
Settings



Person responsible: Robin Approver

Click Settings and set the 'Person responsible' for receiving online requests. If not in the drop-down, click the green cross to add new persons. The 'Person responsible' **must set the Notification Preference to be notified** when an online subject access request is received. To do this, click the drop-down under the username in the top right corner.

The 'Received' and 'In progress' sections have 3 dots. Set the default task owner and the number of days within which the default task owner must respond.



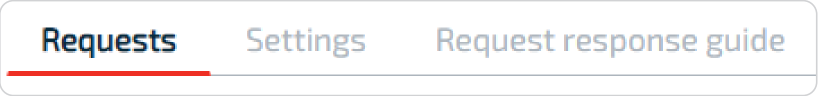
Default task owner: Robin Approver

Days till task is due: 7

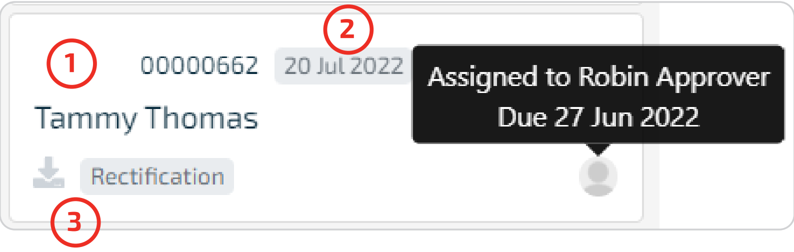
Online subject access request form

Still under Settings – ask your web developer to embed the code behind a link on your website – name it something relevant like 'Subject Access Requests'. Add the domains from where you will be calling this link. Click 'Preview' to see how it will present to the requester.

Requests



Online requests are auto-received here. You may add requests manually by clicking Add New



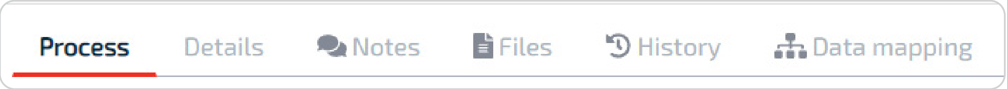
00000662 20 Jul 2022

Tammy Thomas

Rectification

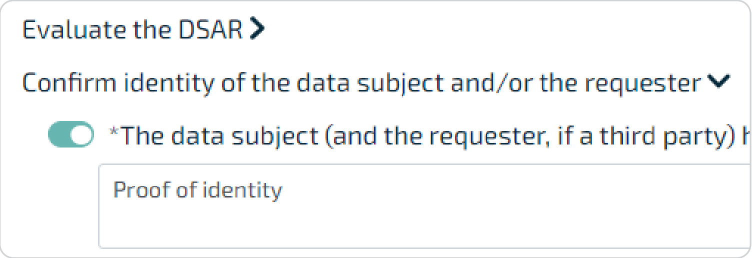
Assigned to Robin Approver
Due 27 Jun 2022

Looking at the panel above, we can see the automatically assigned reference number **(1)**, the due date **(2)** and the download button, **(3)**



Click a panel to enter. When you click on Process you will notice the 3 stages – **Received, In Progress, and Complete.**

Received



Evaluate the DSAR >

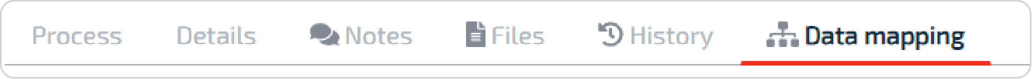
Confirm identity of the data subject and/or the requester ⌄

*The data subject (and the requester, if a third party) h

Proof of identity

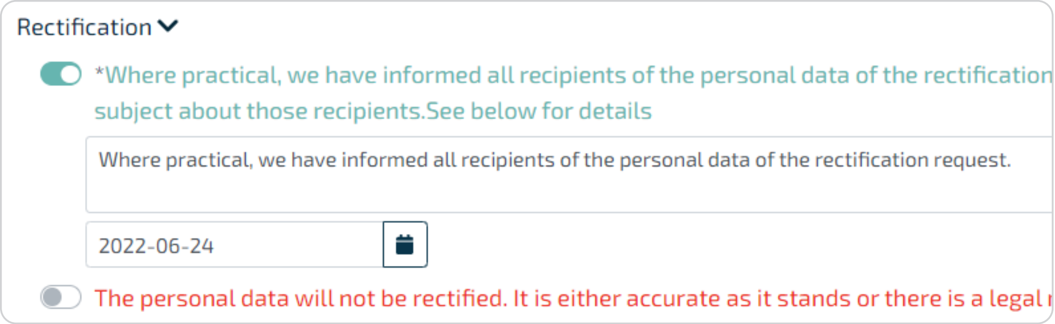
Evaluate the DSAR as there may be reasons why you wish to reject it. If it's a legitimate request, indicate how you have proven the identity of the requester. As soon as you tab out of that field, the Move to In Progress button is revealed.

In progress



If your data mapping is accurate and current, it should give you clear indication of where to search. If you think any of the data mapping appears vague, inform your privacy manager. For example, if a processing location suggested 'Application Server', it might be useful to name the application instead.

Once you have all the data to support your decision, step through the rules. Any rule with a star * **is mandatory. Hover over the text to see supporting information. The blue text indicates the request is successful and the red text means it has failed.**



Rectification

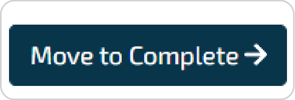
*Where practical, we have informed all recipients of the personal data of the rectification subject about those recipients.See below for details

Where practical, we have informed all recipients of the personal data of the rectification request.

2022-06-24

The personal data will not be rectified. It is either accurate as it stands or there is a legal r

If you have followed the steps correctly, you'll be able to move the request to the Complete column.

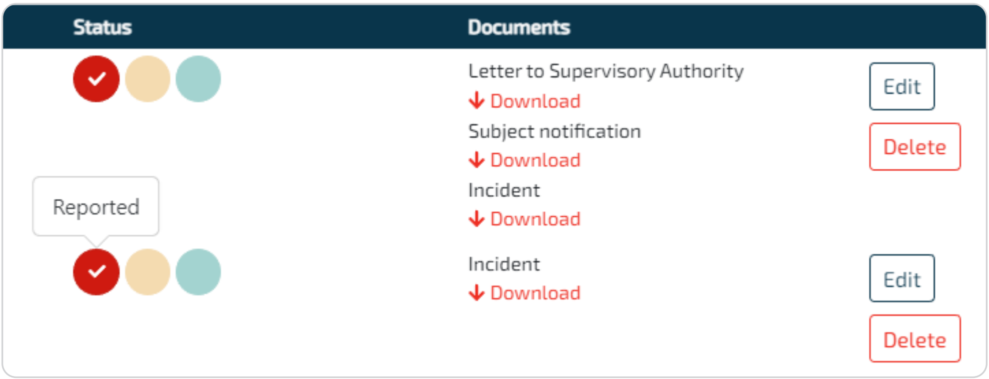


Breach Management

A personal data breach could lead to the accidental or unlawful use, destruction, loss, alteration, or disclosure of that information – in other words, a breach. A breach, not appropriately responded to, could result in physical, material, or non-material stress to data subjects and could well have a financial and/or reputational impact on your organisation.

A Controller must inform the Authority / Regulator as soon as reasonably possible after becoming aware of a security compromise. The Controller also needs to communicate with data subjects, especially where the exposure presents a high-risk to them. They should also consider the possibility that law enforcement authorities may need to be involved e.g., where there are safety concerns or perhaps, where early disclosure to data subjects could hamper investigations.

Use this section to capture and manage your responses to any incidents as well as communications with the Authority / Regulator and data subjects. Ensure that your Processors have a similar process in place. Doing table-top exercises fosters good practice that keeps the relevant staff aware of the processes involved in breach response management. Print those documents as evidence of training and then remove the incidents so that they don't obscure your dashboard.



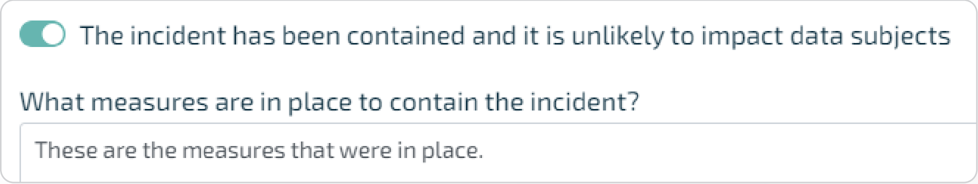
Status	Documents	
✓ ● ●	Letter to Supervisory Authority ↓ Download Subject notification ↓ Download Incident ↓ Download	Edit Delete
Reported ✓ ● ●	Incident ↓ Download	Edit Delete

In the above example we have two types – the first where the incident was contained, there was no need to report it and we only needed the incident report. The second is where it had to be reported to both the Regulator and the data subjects impacted – in some cases you may be prevented from informing the data subjects.

Click Add New

Read the Introduction, followed by some background into Containment & Recovery.

Fill in the details required for the Incident title, followed by the Incident details. Next, we're at the Risk Assessment step.



The incident has been contained and it is unlikely to impact data subjects

What measures are in place to contain the incident?

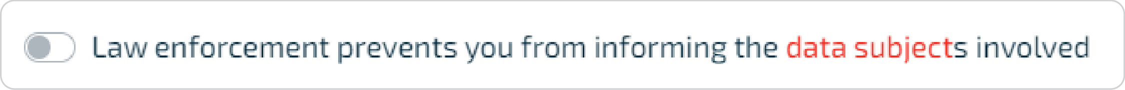
These are the measures that were in place.

Move to the final step which is the Incident evaluation and response. Clicking 'Finish' takes you back to the register and you will notice that it is only the Incident Report that is produced.

However, if the incident *hasn't* been contained you will move through the steps until you get Notification to the Authority / Regulator. Here you will find all the content which is based on your prior input. Use this information in your engagement with the Authority.

The next page is the content based on your prior input and should inform your communications with those data subjects who may be affected by the incident.

NOTE: Law enforcement – If you had selected this item under the Risk Assessment, the content you would normally use to communicate with data subjects will not be displayed.



○ Law enforcement prevents you from informing the data subjects involved

Data Protection Impact Assessment

Conducting a DPIA is a legal requirement to help meet privacy and data protection expectations of customers, employees, and other stakeholders. A DPIA is intended to be prospective and proactive and should act as an early warning system by considering privacy and compliance risks in the initial design and throughout the project. This section allows you to identify why a DPIA is relevant for this project.

A DPIA is a process designed to describe the processing, assess its necessity and proportionality, and help manage the risks to individuals' resulting from the processing of personal data, by assessing them and determining the measures to address them. DPIAs are important tools for accountability, as they help a controller to demonstrate that appropriate measures will be or have been taken to ensure compliance with GDPR.

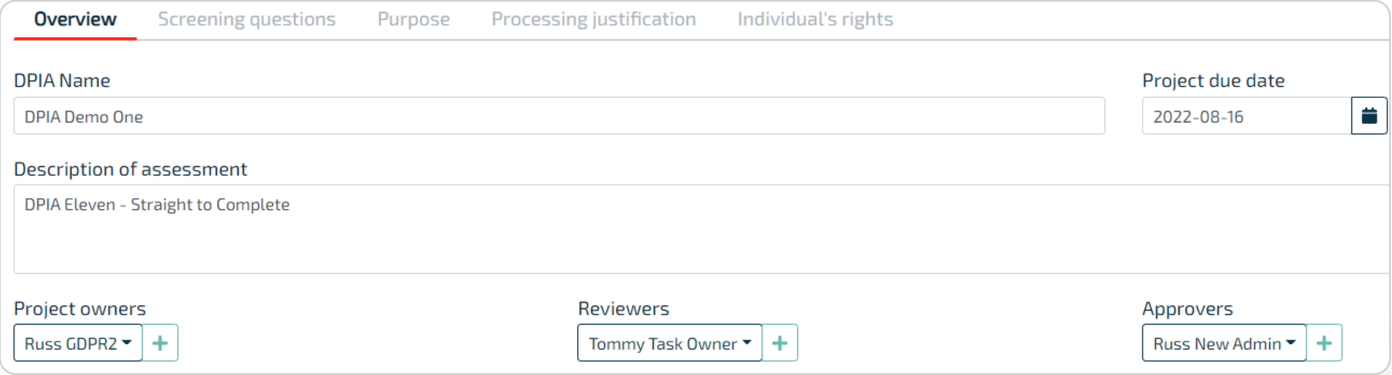
The EU's new Transfer Impact Assessment workflow is being added to the DPIA procedure and this document will be updated accordingly.

Some examples of where a DPIA may be required:

- A hospital processing its patients' genetic and health data
- The use of a camera system to monitor driving behaviour on highways. The data controller envisages to use an intelligent video analysis system to single out cars and automatically recognise license plates
- A company monitoring its employees' activities, including the monitoring of the employees' workstation, internet activity, etc
- The gathering of public social media profiles data to be used by private companies generating profiles for contact directories
- In some instances where the processing might require prior consultation with the Regulator

Click:

Enter the DPIA Name, Description and Project due date. Click **Save.**



DPIA Name: DPIA Demo One

Project due date: 2022-08-16

Description of assessment: DPIA Eleven - Straight to Complete

Project owners: Russ GDPR2

Reviewers: Tommy Task Owner

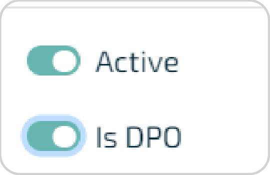
Approvers: Russ New Admin

The Project owner is usually the person compiling and editing the DPIA.

Select the **Reviewer**(s) or add any not in the drop-down list (click the green cross). Reviewers can only be Compliance Users or Task Owners.

Select the **Approver**(s). Approvers must be Administrator type users.

The DPO's comments in the DPIA will be recorded as such. Indicate which user is the DPO under Organisation /Users.

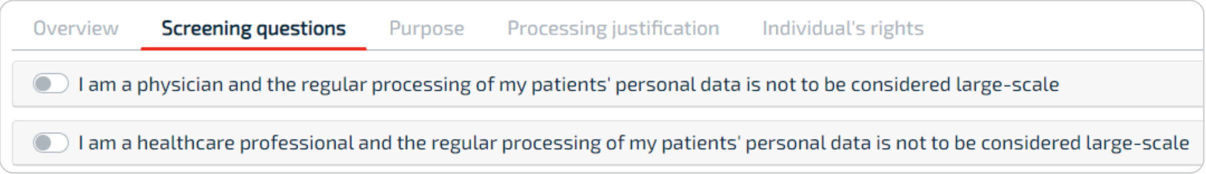


Active

Is DPO

Screening Questions

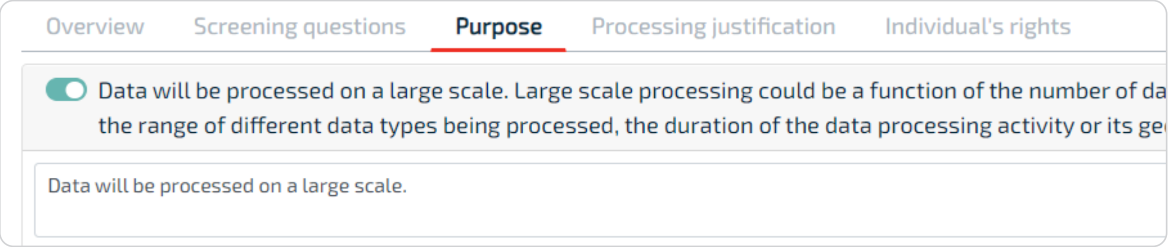
By selecting an option under screening questions, you're suggesting that a DPIA is not relevant or required. The rest of the DPIA falls away. However, you still need to submit it for approval.



I am a physician and the regular processing of my patients' personal data is not to be considered large-scale

I am a healthcare professional and the regular processing of my patients' personal data is not to be considered large-scale

Purpose

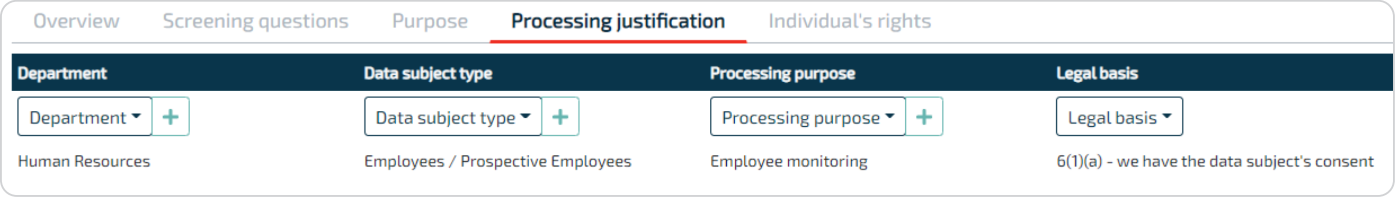


Data will be processed on a large scale. Large scale processing could be a function of the number of da the range of different data types being processed, the duration of the data processing activity or its ge

Data will be processed on a large scale.

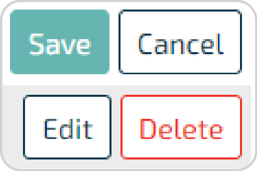
In this section, you indicate why the DPIA is relevant to this project or planned processing of personal data. Add comments or upload documents by clicking 'Notes and Files'. You may add your own reason for conducting a DPIA.

Processing justification

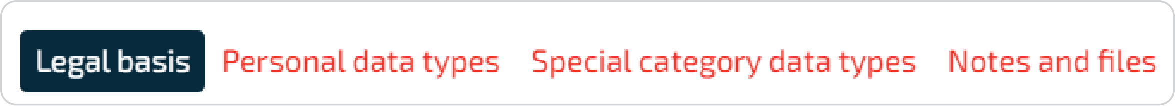


Department	Data subject type	Processing purpose	Legal basis
Human Resources	Employees / Prospective Employees	Employee monitoring	6(1)(a) - we have the data subject's consent

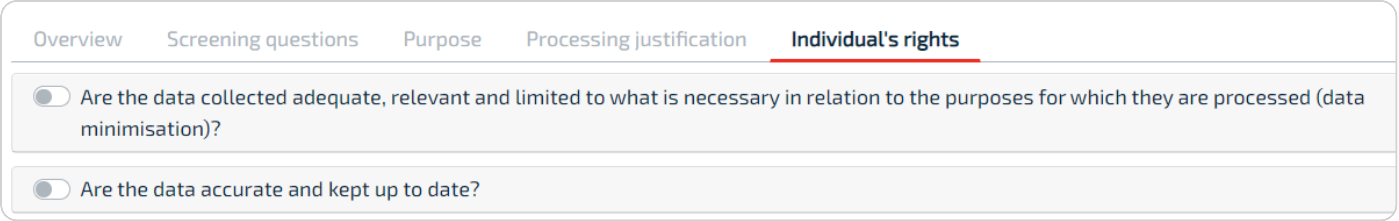
Select the relevant department / data subject type / processing purpose and legal basis. Then click **Save**.



In the next panel, complete the mandatory fields (highlighted in red), enter the relevant personal data types, add any notes and files, and then click Close.



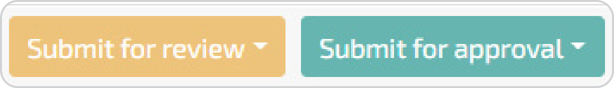
Individual's rights



Are the data collected adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation)?

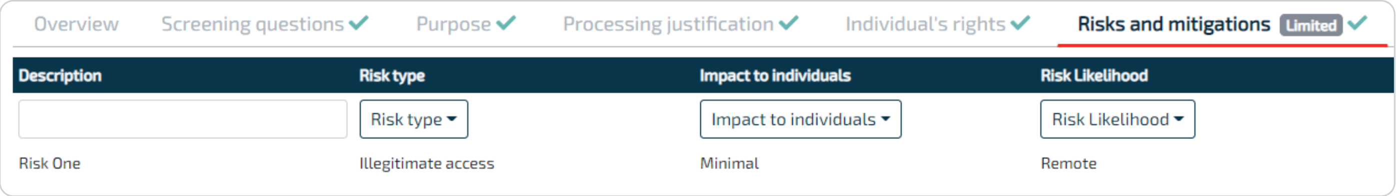
Are the data accurate and kept up to date?

This section concerns data subjects' rights and **how those rights will be protected**. Once you have completed this section, you're now ready to submit the DPIA for Review (first) and for Approval (last). The reviewer and approver will receive notifications informing them of the task. After inserting their comments, the reviewer may return the DPIA for improvement or the Approver can approve the sections.



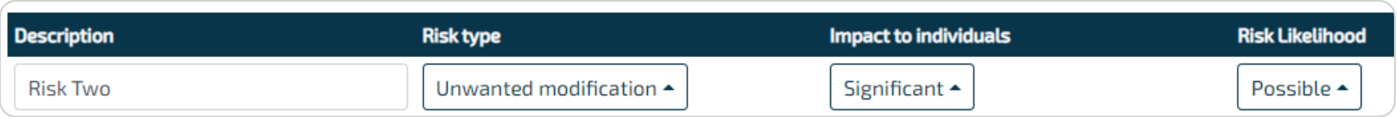
Risks and Mitigations

This then reveals the Risks and mitigations tab to the DPIA owner.



Description	Risk type	Impact to individuals	Risk Likelihood
	Risk type ▾	Impact to individuals ▾	Risk Likelihood ▾
Risk One	Illegitimate access	Minimal	Remote

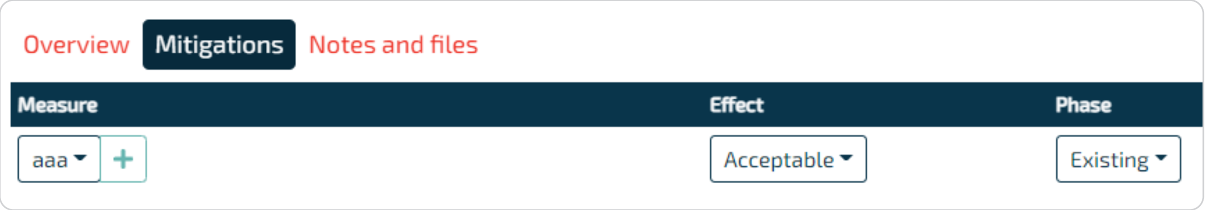
The DPIA owner will then add a relevant risk and click Save.



Description	Risk type	Impact to individuals	Risk Likelihood
Risk Two	Unwanted modification ▴	Significant ▴	Possible ▴

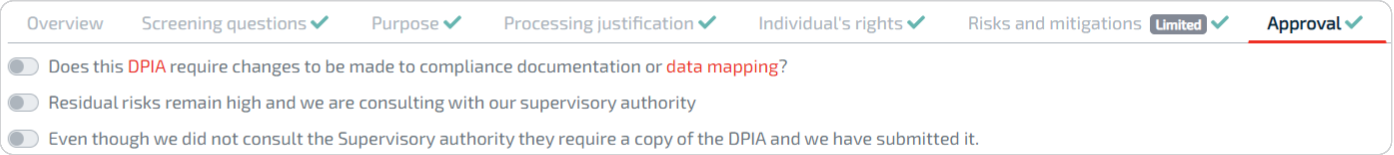
Then add an associated mitigation.

NOTE: If a mitigation has been added, it cannot be edited – it must be deleted and then replaced by the correct mitigation.



Measure	Effect	Phase
aaa ▾ +	Acceptable ▾	Existing ▾

When all risks and mitigations are captured, submit the DPIA for approval.



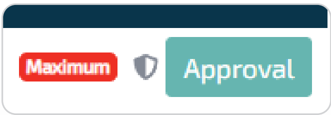
○ Does this DPIA require changes to be made to compliance documentation or data mapping?

○ Residual risks remain high and we are consulting with our supervisory authority

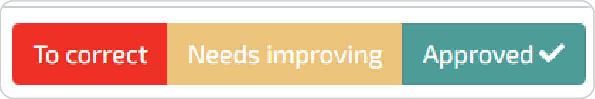
○ Even though we did not consult the Supervisory authority they require a copy of the DPIA and we have submitted it.

Final Approval

Approve each risk individually by clicking Approve to the right. Click Close and return to the main approval page.



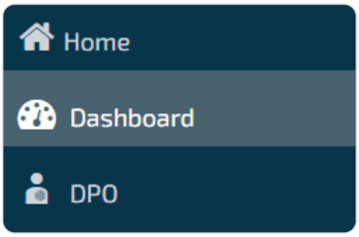
Then approve the risks overall by adding comments and the approval at the bottom of the page and submit to the owner.



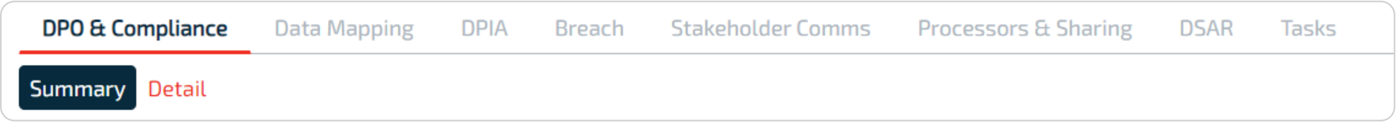
There are 2 possible outcomes after final approval. The owner could move the DPIA to Complete where those identified risks must be incorporated into your projects risk management framework. Or move it to the Submitted column where engagement with the Authority / Regulator is necessary.

Dashboard

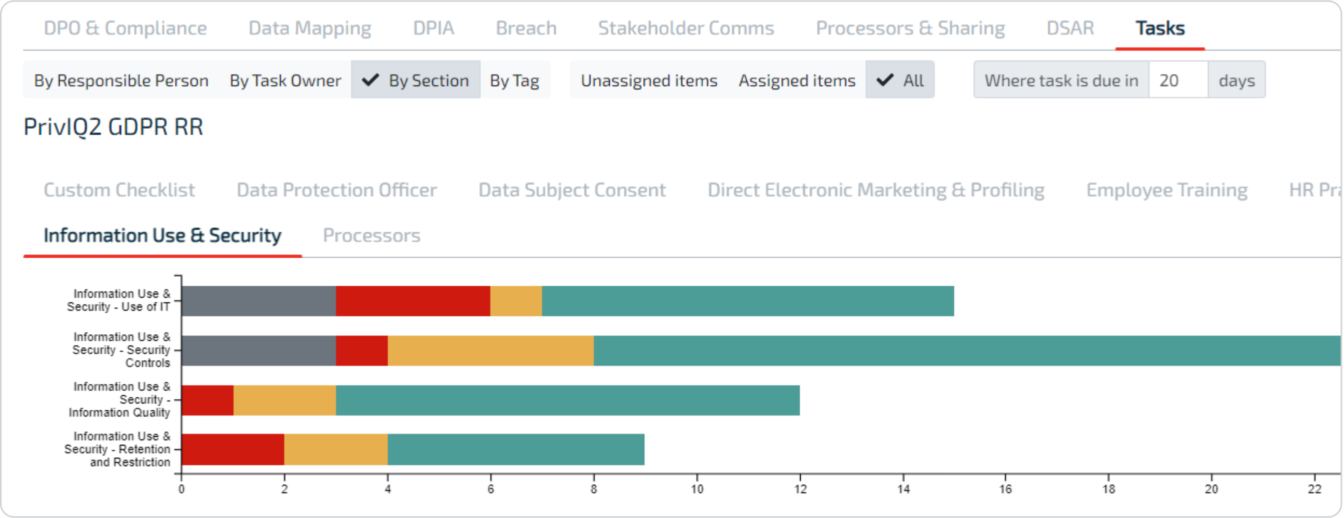
Find the dashboard icon in the sidebar.



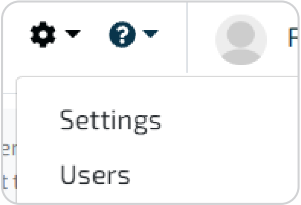
You may view across the various sections.



When you view tasks by task owner, click on the task owner to see which tasks have been assigned to the task owner.



User Maintenance



Add and manage users under Users. If you add Compliance Users here, you must ensure that they have been assigned as the person responsible in the relevant Compliance sections.

To provide an extra layer of security, we've added multi-factor authentication (MFA).

New users will receive a welcome email, inviting them to login with a temporary password and then changing their password. You can choose to either receive a verification code via SMS which you will enter along with password. Or, preferably, you can use an authenticator, such as Authy, Google Authenticator (iOS/Android) or Microsoft Authenticator, that will generate the verification code to enter with your password.

Glossary

Data Subject – means the person to whom personal data relates.

Personal Data – means any information relating to an identified or identifiable natural person (‘data subject’)

Controller – means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data

Processor – means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller

Information Owner - an individual that has approved management responsibility for controlling the maintenance, use and security of the personal data

GDPR – Protection of Personal Data Act

DPIA – Privacy Impact Assessment

MFA – Multi Factor Authentication